On September 11, 2001, when cell phones failed, terrestrial phone lines were jammed and the internet overloaded, High Frequency (HF) radio was a key resource linking together the state Emergency Operating Centers of New York, New Jersey and Pennsylvania. I know this because I participated in these efforts from the Mercer County, NJ Emergency Operating Center as we marshaled ambulances to respond to the World Trade Center.

The proposal to ease FCC Part 15 to permit broadband internet access over power transmission lines (BPL) supports a highly flawed technology that should actually be discouraged. If BPL had been in place that tragic day, these essential communications coordinating the emergency response would have been seriously impaired.

Promoting an unneeded technology that disrupts vital emergency communications in this time of terrorist threats to our nation is foolhardy. The Federal NTIA has just recommended to the FCC that no relaxation in FCC rules should be permitted for BPL. I am certain now that you are aware of the dangerous national security consequences of BPL implementation, you will help ensure that existing licensed users of the radio spectrum are completely protected from this form of "radio smog."

Power lines were designed to transmit electrical energy. They were not designed to transmit broadband signals, which are really radio-frequency (RF) signals. When a broadband signal is put on a power line, much of the RF energy leaks off the line and radiates, jamming nearby radio receivers. Interference has been documented at test sites throughout the country and overseas where BPL is in operation. Other nations have actually banned BPL as a result. Recordings of actual interference are available at www.arrl.org/bpl.

I support expanded broadband services to consumers at lower cost. However, there are ways to deliver broadband that do not pollute the radio spectrum as BPL does. These include fiber-to-the-home, cable, DSL, and Broadband Wireless Access. None of these technologies causes interference to HF radio.

The FCC recognizes the interference potential of BPL and is in the midst of a rulemaking proceeding, ET Docket No. 04-37, that proposes new requirements and measurement guidelines for BPL systems. However, the FCC proposals do not go nearly far enough to protect existing over-the-air radio communication services.

In short, BPL has a major disadvantage that is not shared by other broadband technologies and that outweighs whatever benefit it may offer. National broadband telecommunications policy should not include support for BPL, but should focus on other, more appropriate technologies that will not disrupt our Homeland Security and emergency response communications capabilities.

Thank you for help in making sure that the HF radio spectrum is kept clear of BPL interference.

Sincerely,

Gary Wilson
Assistant Radio Officer
Mercer County Office of Emergency Management